

## JENNIFER H. CHUNG, PLLC

February 24, 2025

Hon. James B. Clark, III  
United States Magistrate Judge  
United States District Court  
District of New Jersey  
Martin Luther King Jr. Courthouse  
50 Walnut Street, Court Room MLK 2A  
Newark, New Jersey 07101

Re: 2:23-cv-03047; *Bayshore Recycling Corporation v. Hallmark Specialty Insurance Company, et al.*

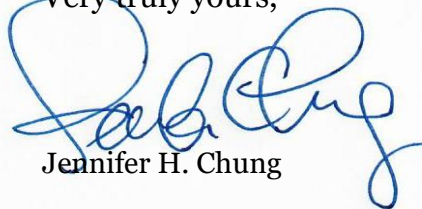
Dear Judge Clark,

The parties jointly write to the Court with a discovery update in advance of the February 27, 2025 status conference.

Since the last status conference, a ruling was issued on NFP's motion to dismiss and NFP has filed an answer. Plaintiff intends to serve an affidavit of merit and NFP intends to supplement production by end of next week and Defendants will depose Plaintiff's corporate representative after receipt of the affidavit of merit. Also, NFP will offer its corporate representative after the deposition of Plaintiff's corporate representative. NFP will also need additional time to evaluate the need for any experts after review of the affidavit of merit.

As such, additional time is needed to complete discovery and the parties jointly request an extension until and through May 2, 2025 or later to complete discovery in this matter.

Very truly yours,



Jennifer H. Chung